



JAMES DONDERO,	§	
Appellant,	§	Civil Action No.
	§	
v.	§	3:21-cv-00132-E
	§	
HIGHLAND CAPITAL MANAGEMENT, L.P.,	§	
Appellee.	§	

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**DEBTOR’S OPPOSITION TO JAMES DONDERO’S MOTION FOR  
LEAVE TO APPEAL PRELIMINARY INJUNCTION**

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TO: THE HONORABLE ADA BROWN, UNITED STATES DISTRICT JUDGE:

Plaintiff Highland Capital Management, L.P., the above-captioned debtor and debtor-in-possession (the “Debtor” or “Appellee”) and the plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”), hereby submits this opposition (the “Opposition”) to *Appellant James Dondero’s Motion for Leave to Appeal* [Docket No. 2]<sup>2</sup> (the “Motion”) and *Appellant James Dondero’s Emergency Motion for Expedited Appeal* [Docket No. 3] (the “Motion to Expedite”) (together, the “Motions”), filed by James Dondero (“Appellant”), in connection with the Bankruptcy Court’s *Order Granting Debtor’s Motion for a Preliminary Injunction against James Dondero* [Adv. Pro. Docket No. 59]<sup>3</sup> (the “Preliminary Injunction”). Appellee fully incorporates by reference its contemporaneously filed *Brief in Opposition to Dondero’s Motion for Leave to Appeal Preliminary Injunction* (the “Brief”) and would show unto the Court as follows:

**I. Relief Requested**

1. By this Opposition, and based on the facts and arguments set forth more fully in Appellee’s Brief, Appellee respectfully requests that the Court enter an Order denying Appellant’s

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<sup>2</sup> Refers to the civil action docket maintained by the United States District Court for the Northern District of Dallas (the “District Court”).

<sup>3</sup> Refers to the Adversary Proceeding docket maintained in the Highland Bankruptcy Case.

Motions seeking leave to appeal the Preliminary Injunction and for an expedited appeal.

WHEREFORE, PREMISES CONSIDERED, Appellee respectfully requests that the Court enter an order (i) denying Appellant's Motions in their entirety, and (ii) granting Appellee such other and further relief as is just and equitable.

Dated: January 27, 2021.

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-and-

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*/s/ Zachery Z. Annable*

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